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UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 UNITED STATES OF AMERICA,

Case No. 2:19-cr-327-GMN-VCF

Plaintiff,

**Stipulation to Extend Response Deadline
to Defendant's Motion to Dismiss
Indictment [ECF No. 97]**

v.

(First Request)

JACQUES ANTON LANIER,
Defendant.

14 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
15 Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel
16 for the United Stated of America, and Christopher R. Oram, Esq., and Nancy M. Lemcke, Esq.,
17 counsel for Jacques Anton Lanier, that the deadline to responds to Defendant's Motion to
18 Dismiss Indictment (ECF No. 97) currently scheduled for May 11, 2021, be extended to May 26,
19 2021. This Stipulation is entered into for the following reasons:

20 1. Government counsel will be on a jury trial starting May 3, 2021, which is expected
21 to last approximately one and half to two weeks. As such, the response deadline is currently
22 scheduled to expire while government counsel is on trial.

- 23 2. The defendant is in custody and does not object to the extension.
24 3. The parties agree to the extension.

1 4. Additionally, denial of this request for an extension could result in a miscarriage of
2 justice.

3 5. The additional time requested by this stipulation is made in good faith and not for
4 purposes of delay.

5 6. This is the first request for extension filed herein.

6 **DATED:** this 28th day of April, 2021.

7 CHRISTOPHER CHIOU
8 Acting United States Attorney

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10 /s/ *Bianca R. Pucci*
11 BIANCA R. PUCCI
12 Assistant United States Attorney

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10 /s/ *Christopher R. Oram*
11 CHRISTOPHER R. ORAM, Esq.
12 NANCY M. LEMCKE, Esq.
13 Attorney for Defendant:
14 JACQUE ANTON LANIER

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:19-cr-327-GMN-VCF

Plaintiff,

ORDER

V.

JACQUES ANTON LANIER,

Defendant.

Based on the Stipulation of the parties, the deadline to respond to defendant's motion to dismiss indictment in this matter is hereby extended. The failure to grant said extension would be likely to result in a miscarriage of justice, and would deny the government sufficient time and the opportunity within which to be able to effectively and thoroughly prepare its response, taking into account the exercise of due diligence.

IS IT HEREBY ORDERED that the response deadline to respond to the Defendant's Motion to Dismiss Indictment (ECF No. 97) in the above-captioned matter currently scheduled for May 11, 2021, be extended to May 26, 2021.

DATED this 29th day of April, 2021.

Carl Gaskins

HONORABLE CAM FERENBACH
United States Magistrate Judge